

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 03-34 E
)	
TODD STAHLI)	

MOTION TO CONTINUE HEARING ON PETITION
TO REVOKE SUPERVISED RELEASE

AND NOW, comes the defendant, Todd Stahli, by his attorney, Thomas W. Patton, Assistant Federal Public Defender, and respectfully files this Motion to Continue Hearing on Petition to Revoke Supervised Release, and in support thereof sets forth as follows:

1. A petition to revoke Mr. Stahli's supervised release has been filed based upon the allegation that Mr. Stahli violated the conditions of his supervision by committing the offenses of burglary, aggravated assault, and simple assault in Elk County, Pennsylvania.

2. On June 22, 2005, this Court postponed the hearing on the petition indefinitely pending the resolution of Mr. Stahli's appeal of his conviction to the Superior Court of Pennsylvania.

3. Mr. Stahli's convictions were affirmed by the Superior Court on April 5, 2006, and his Application for Reargument or Reconsideration was denied on June 8, 2006.

4. The Court has scheduled a hearing on the petition to revoke Mr. Stahli's supervised release for August 22, 2006 at 8:30 a.m.

5. Mr. Stahli has filed a Petition for Allowance of Appeal From Superior Court with the Supreme Court of Pennsylvania asking that court to review his conviction.

6. For the same reasons Mr. Stahli asked the Court to continue his revocation hearing until after the completion of his appeal to the Superior Court, Mr. Stahli respectfully requests that the Court continue his revocation hearing indefinitely pending resolution of his case before the Supreme

Court of Pennsylvania.

7. The United States does not object to this motion.

WHEREFORE, the defendant, Todd Stahli, respectfully requests that this Honorable Court continue his revocation hearing indefinitely pending resolution of his appeal presently pending before the Supreme Court of Pennsylvania.

Respectfully submitted,

/s/ Thomas W. Patton

Thomas W. Patton

Assistant Federal Public Defender

PA I.D. No. 88653